

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

MDL No. 2323
No. 12-md-2323-AB

THIS DOCUMENT RELATES TO:

CIVIL ACTION
Case No. 2:12-cv-1024

LARRY BARNES, et al.

Plaintiffs,

v.

NATIONAL FOOTBALL LEAGUE, et al.,

Defendants.

**RIDDELL DEFENDANTS' REPLY IN SUPPORT OF REQUEST
FOR JUDICIAL NOTICE RE MOTION TO DISMISS
PLAINTIFFS' SECOND AMENDED COMPLAINT; EXHIBIT "A"**

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Attorneys for Defendants RIDDELL, INC.; ALL AMERICAN
SPORTS CORPORATION; RIDDELL SPORTS GROUP, INC.;
EASTON-BELL SPORTS, INC.; EASTON-BELL SPORTS, LLC;
EB SPORTS CORP.; and RBG HOLDINGS CORP.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LARRY BARNES, et al.,

Plaintiffs,

vs.

NATIONAL FOOTBALL LEAGUE,
et al.,

Defendants.

CASE NO.: CV 11-8396 R (MANx)

**RIDDELL DEFENDANTS' REPLY IN
SUPPORT OF REQUEST FOR
JUDICIAL NOTICE RE MOTION TO
DISMISS PLAINTIFFS' SECOND
AMENDED COMPLAINT; EXHIBIT
"A"**

Date: February 6, 2012
Time: 10:00 a.m.
Dept: Courtroom 8

Judge: Hon. Manuel L. Real

Notice of related cases:
No. CV 11-08394 R (MANx)
No. CV 11-08395 R (MANx)

1 Defendants Riddell, Inc. (erroneously styled as “d/b/a Riddell Sports Group,
2 Inc.”); All American Sports Corporation; Riddell Sports Group, Inc.; Easton-Bell
3 Sports, Inc.; Easton-Bell Sports, LLC; EB Sports Corp.; and RBG Holdings Corp.
4 (collectively, the “Riddell Defendants”)¹, pursuant to L.R. 7-10, submit this reply
5 in response to Plaintiffs’ Opposition to Riddell Defendants’ Request for Judicial
6 Notice in Support of Motion to Dismiss and in support of the Riddell Defendants’
7 Request for Judicial Notice in Support of Motion to Dismiss Plaintiffs’ Second
8 Amended Complaint. Riddell Defendants refer this Court to their Reply
9 Memorandum of Points and Authorities in Support of Request for Judicial Notice
10 Re Motion to Dismiss Plaintiffs’ First Amended Complaint filed in the related
11 case, *Vernon Maxwell, et al. v. National Football League, et al.* (Case No. 11-8394
12 R (MANx)), on January 23, 2012. The Riddell Defendants incorporate that
13 memorandum and those arguments from *Maxwell* as if made fully herein.²

14 For the reasons stated in the attached memorandum, the Riddell Defendants
15 respectfully request that this Court grant the Riddell Defendants’ Request for
16 Judicial Notice in Support of Motion to Dismiss Plaintiffs’ Second Amended
17 Complaint in its entirety.

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22 ¹Referring to these Defendants collectively does not imply or concede that they are
23 properly joined or named as Defendants, and the “Riddell Defendants” reserve the
24 right to move to dismiss some or all of them. The collective reference is merely
25 for convenience.

26 ² A true and correct copy of the Riddell Defendants’ Reply Memorandum of Points
27 and Authorities in Support of Request for Judicial Notice Re Motion to Dismiss
28 Plaintiffs’ First Amended Complaint filed in the related case of *Vernon Maxwell, et al. v. National Football League, et al.* (Case No. 11-8394 R (MANx)), on January 23, 2012, is attached hereto as Exhibit “A.”

1 DATED: January 23, 2012

BOWMAN AND BROOKE LLP

2
3 By: /s/ Paul G. Cereghini

4 Paul G. Cereghini

5 Vincent Galvin

6 Marion V. Mauch

7 Attorneys for Defendants RIDDELL,

8 INC.; ALL AMERICAN SPORTS

9 CORPORATION; RIDDELL

10 SPORTS GROUP, INC.; EASTON-

11 BELL SPORTS, INC.; EASTON-

12 BELL SPORTS, LLC; EB SPORTS

13 CORP.; and RBG HOLDINGS

14 CORP.